

UNITED STATES DISTRICT COURT  
for the  
Northern District of Texas

FILED

March 21, 2024

KAREN MITCHELL  
CLERK, U.S. DISTRICT  
COURT

United States of America )  
v. )  
JAMES CRAVEN PIERCE, III ) Case No.  
 )  
 )  
 )  
 )

3:24-MJ- 275-BK

*Defendant(s)*

## **CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 30, 2023 in the county of Dallas in the  
Northern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 875(c)	Interstate Communications with Threats

## *Code Section*

### *Offense Description*

18 U.S.C. § 875(c)

# Interstate Communications with Threats

This criminal complaint is based on these facts:

See attached Affidavit of FBI Special Agent Meghan De Amaral.

Continued on the attached sheet.

Complainant's signature

Meghan De Amaral, Special Agent, FBI

*Printed name and title*

Agent sworn and signature confirmed w

Dallas, Texas

RENEE HARRIS TO LIVERPOOL U.S. Magistrate Judge

P. J. G. VAN DER KAM

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JAMES CRAVEN PIERCE, III

3:24-mj- 275-BK

**Filed Under Seal**

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Meghan De Amaral, being first duly sworn, hereby depose and state as follows:

**Introduction**

1. As set forth in further detail below, there is probable cause to believe that James Craven Pierce, III, sent a bomb threat by text message from the Northern District of Texas to a high school student in Houston, Texas, on or about August 30, 2023.

**Agent Background**

2. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been since July 2020. I am currently assigned to the Dallas Division, where I serve on the North Texas Joint Terrorism Task Force. In this capacity, I am responsible for investigating domestic terrorism cases, including, but not limited to, weapons of mass destruction violations, racially and sexually motivated acts of violence, and militia/anti-government extremists. I have received training in domestic and international terrorism; computers, ransomware, and digital evidence; financial analysis and investigative methods and applications, to include cryptocurrency; techniques for disguising and transmitting the proceeds of illegal activities; and asset forfeiture. I have participated in investigations regarding domestic and international terrorism, violent and narcotics-

related crimes, and crimes against children, and within these, have experience investigating criminal violations including Conspiracy, Interstate Communications and Threats, Computer Intrusion, Stalking, and False Information and Hoaxes. These investigations have involved the use of physical surveillance, cooperating witnesses, financial and telephone toll record analysis, the execution of search and arrest warrants, and the debriefing of witnesses and subjects. I also have experience in the review of evidence obtained during the execution of search warrants.

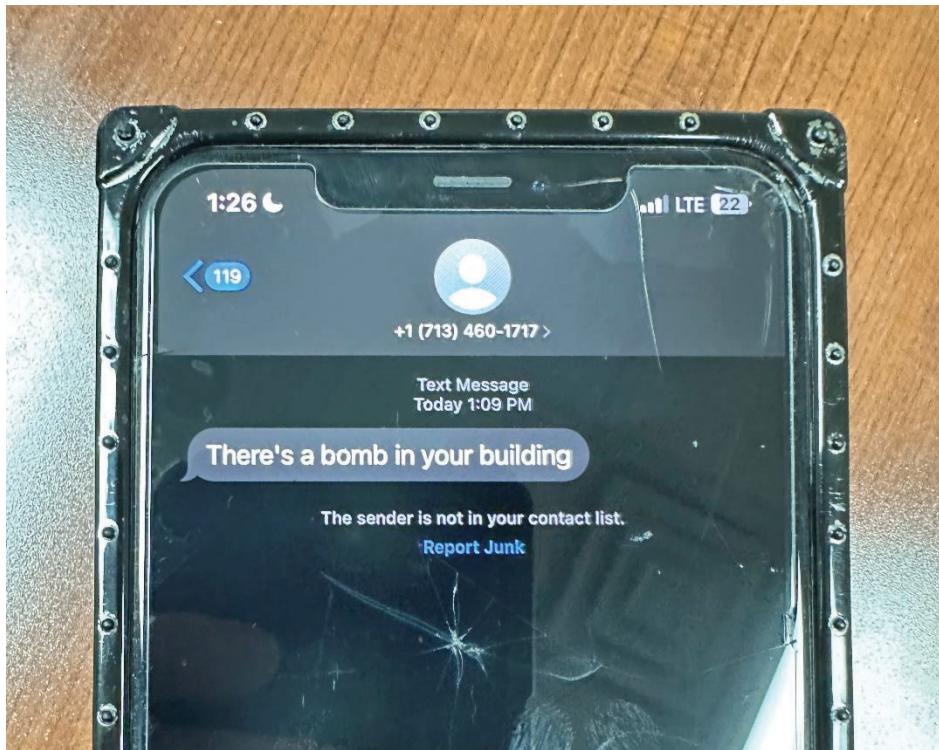
3. The information contained in this affidavit is based on, among other things, my personal knowledge and observations during the course of this investigation; information conveyed to me by victims, other agents and members of the FBI, the public, other government agencies and officials (including law enforcement), and security researchers; and my review of records, documents, and other evidence obtained during this investigation. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

#### **Applicable Law**

4. Pursuant to 18 U.S.C. § 875(c), “[w]hoever transmits in interstate or foreign commerce any communication containing any threat ... any threat to injure the person of another, shall be fined under this title or imprisoned not more than five years, or both.”

**Probable Cause**

5. On or about August 30, 2023, the Fort Bend Independent School District Police Department (“Fort Bend ISD PD”) contacted FBI Houston to report Victim 1, a 17-year-old female student, received a text message from telephone number 713-460-1717 at 1:09 pm CDT, which stated “There’s a bomb in your building” (as pictured below):



6. Law enforcement subsequently searched the school and did not find any explosive devices. A school official reported that she tried calling the number that sent the text message to Victim 1 and reported that her call was answered with an automated message stating that the number was unavailable. Later that day, at approximately 3:46 p.m., the school official received a text message from the same 713-460-1717 number, which stated, “There’s a bomb in your building[.]”

7. On or about September 22, 2023, the Fort Bend ISD PD conducted a follow-up interview of Victim 1. During the interview, Victim 1 explained that, other than receiving the text message with the bomb threat, she was not aware of / had not experienced any unusual online interactions. Victim 1 did not recognize the number that sent the threatening text message.

8. Fort Bend ISD police determined that the provider for telephone number 713-460-1717 was TextNow.

9. I understand TextNow to be a free VoIP service that allows users to text and call any number in the United States and/or Canada. Users are also able to purchase credits to make international long-distance calls. TextNow users register accounts with email addresses. Once registered, TextNow provides the user with a phone number that can be used to make calls from any smartphone, tablet, or desktop computer with an Internet connection.

10. According to information provided to me by TextNow, because TextNow is a VoIP provider, communications sent by TextNow users are routed through TextNow's servers, which are located in Waterloo, Ontario, Canada.

11. TextNow records reflect that the account for phone number 713-460-1717 was registered with username "james1stsmartphone" and email address cassette2go@gmail.com on or about August 5, 2015. TextNow records also reflect that the account was accessed at least 683 times from at least three unique IP addresses

between August 21, 2023, 8:56 a.m. (CDT)<sup>1</sup> and August 30, 2023, 2:31:57 p.m. (CDT).

Of those IP addresses, two returned to TextNow, while the third, 172.11.129.164, was identified as a residential IP address serviced by AT&T.

12. Per Fort Bend ISD PD's initial report to FBI Houston, AT&T provided the subscriber information for IP address 172.11.129.164 as follows:

Margaret Pierce  
6916 Echo Bluff Drive  
Dallas, TX 75248  
Primary number 214-334-7261  
Alternate number 972-233-0932

13. Further review of IP logs for the TextNow account show IP address 172.11.129.164 was used to access the account on at least 334 unique occasions in the aforementioned login window (August 21 to 30, 2023), to include logins to the account on August 30, 2023, at 1:09:11 p.m. (CDT), 1:09:22 p.m. (CDT), 1:09:28 p.m. (CDT), 1:09:30 p.m. (CDT), 1:09:39 p.m. (CDT), and 1:09:44 p.m. (CDT).

14. A search warrant executed on TextNow in October 2023 (3:23-MJ-896-BK) yielded returns identifying phone number 713-460-1717 as having been assigned to account holder James Pierce since August 5, 2015. Message logs for the account showed over 150 text messages sent from phone number 713-460-1717 referencing bombs or other weapons between on or about August 30, 2023, and October 6, 2023, to include “There’s a bomb in your building” sent to Victim 1’s phone number and “There’s a bomb in your building” sent to the school official’s phone number on or about August 30, 2023.

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<sup>1</sup> The times in the TextNow records were provided in UTC format, but have been converted to CDT in this affidavit for the Court’s convenience.

Other messages sent from phone number 713-460-1717 to other phone numbers during the same time frame included:

- “There’s a fertilizer bomb in your building”
- “Nerve gas is being released”
- “The sniper has you in their sights”
- “The sirens in the distance you hear they’re coming for you”
- “Rio grande City there’s a fertilizer bomb in your city”
- “Sugar guard energy you have a bomb in your building”
- “Your building has a nuclear pipe bomb in it”

15. On or about September 5, 2023, the matter was referred to FBI Dallas. On September 21, 2023, a neighbor described the residents of 6916 Echo Bluff Drive to the FBI as Margaret Pierce and her son, who was approximately 60 years of age. Texas driver’s license records associated with Margaret Pierce listed a James Pierce, phone number 713-502-9993, as one of her emergency contacts. Using an online SchoolSite Locator tool provided by the Richardson Independent School District (“RISD”), I determined that 6916 Echo Bluff Drive is located within the RISD’s boundaries. A records check with RISD did not identify any RISD students residing at 6916 Echo Bluff Drive.

16. Accurint / LexisNexis searches for James Pierce revealed aliases (and a possible true name) including James Craven Pierce III, and James Pierce Jr. and show that he is approximately 64 years old. The searches identified multiple associated phone

numbers with Houston area codes, including the number used to send the bomb threat to Victim 1, 713-460-1717.

17. The FBI obtained subscriber information from Google, LLC related to the email address that was used to sign up for the 713-460-1717 TextNow account (cassette2go@gmail.com). The Google records list the “Name,” “Given Name,” and “Family Name” associated with the account as “James Pierce (Cassette2go),” “James,” and “Pierce,” respectively. The records show logins to the Google account on December 31, 2022, and January 8, 2023, from the same IP address (172.11.129.164) that was assigned by AT&T to Margaret Pierce at 6916 Echo Bluff Drive and used by the TextNow account on the day the bomb threat to Victim 1 was made. Therefore, I have probable cause to believe that the text message sent to Victim 1 was sent from a cellphone, computer, tablet, or other device that was connected to the Internet at 6916 Echo Bluff Drive.

**Conclusion**

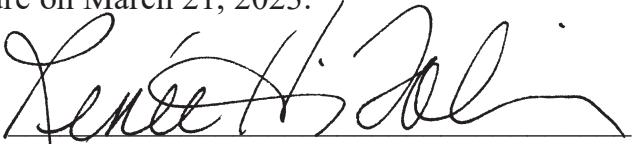
18. Based on my training and experience and the facts as set forth in this affidavit, I submit that there is probable cause to believe that on or about August 30, 2023, in the Northern District of Texas, Dallas Division, James Craven Pierce, III, knowingly transmitted in interstate and foreign commerce a text message communication to Victim 1, containing a threat to injure the person of another, for the purpose of issuing a threat, with knowledge that the communication would be viewed as a threat, and with conscious disregard of a substantial risk that the communication would be viewed as a threat, in violation of 18 U.S.C. § 875(c).

Respectfully submitted,



MEGHAN DE AMARAL  
Special Agent, FBI

Agent sworn and signature confirmed via reliable electronic means, pursuant to Rules 4.1 of the Federal Rules of Criminal Procedure on March 21, 2023.



RENEE HARRIS TOLIVER  
UNITED STATES MAGISTRATE JUDGE